

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CREIGHTON TAKATA, Individually and on :
behalf of all others similarly situated, :

Plaintiff,

v.

RIOT BLOCKCHAIN, INC. F/K/A,
BIOPTIX, INC., JOHN O'ROURKE,
JEFFREY G. MCGONEGAL,

Defendants.

Civil Action No.: 18-2293(FLW)(TJB)

:
: **DECLARATION OF**
: **JOSEPH J. DEPALMA**
: **IN SUPPORT OF LEAD PLAINTIFF'S**
: **MEMORANDUM OF LAW IN**
: **OPPOSITION TO DEFENDANTS'**
: **MOTION TO STRIKE IMPROPER**
: **ALLEGATIONS AND IMAGES FROM**
: **THE CORRECTED AMENDED**
: **CONSOLIDATED CLASS ACTION**
: **COMPLAINT**

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and Lead Counsel for the Class*

DECLARATION OF JOSEPH J. DEPALMA

I, Joseph J. DePalma, hereby declare as follows:

1. I am an attorney admitted to practice in the state of New Jersey and am admitted to practice before this Court in the above-captioned case. I am a member of Lite DePalma Greenberg, Local Counsel for Dr. Stanley Golovac.

2. I respectfully submit to the Court, pursuant to 28 U.S.C. § 1746, this declaration and the attached materials that are referenced in Lead Plaintiff's Memorandum of Law in Opposition to Defendants' Motions to Strike Improper Allegations and Images from the Corrected Consolidated Amended Class Action Complaint.

3. Submitted herewith are true and correct copies of the following:

Exhibit	Description
1	First Amended Complaint and Jury Demand [ECF No. 105] filed in <i>S.E.C. v. Barry C. Honig, et al.</i> , Civil Action No. 1:18-cv-08175 (ER) (S.D.N.Y. Mar. 8, 2019).
2	Riot Blockchain, Inc. Form SC 13D/A (Amended Statement of Beneficial Ownership), including Exhibit No. 99.1 - Letter to the Issuer dated September 20, 2016, filed with the U.S. Securities and Exchange Commission (SEC) by Catherine Johanna DeFrancesco on September 20, 2016.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of October, 2019, in Newark, New Jersey.

/s/ Joseph J. DePalma
Joseph J. DePalma